

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA,

Case No.: 18-cr-00735-MCA

v.

PARMJIT PARMAR
a/k/a “Paul Parmar,”

Defendant.

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**DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS
COUNSEL**

Timothy C. Parlatore, an attorney admitted to practice in this Court, declares under penalty of perjury that the following is true and correct:

1. I am an attorney at law of the State of New Jersey and the managing partner of Parlatore Law Group LLP (“PLG”), attorneys for Defendant Parmjit Parmar a/k/a Paul Parmar (“Defendant”) in the captioned matter. As such, I am fully familiar with the facts set forth herein, and I submit this declaration in support of PLG’s motion to be relieved as counsel.

2. As this Court is aware, a conflict has arisen between Defendant and co-counsel Windels Marx unrelated to any actions taken by Defendant. Our continued engagement in this matter was through an interim conflict waiver agreement to act as independent counsel. When Mr. Parmar revoked this waiver, he effectively

terminated our firm. In light of this termination, our firm is required to withdraw pursuant to New Jersey R.P.C. 1.16(a)(3).

3. Mr. Parmar has expressed a desire to engage our firm independently but has been unable to do so thusfar. I am aware that he has been interviewing other firms and would be open to potentially being fully retained to take over the case, but that has not happened yet.

4. I have spoken with AUSA Carolyn Silane and she has indicated that the Government takes no position on this motion.

5. The undersigned contacted Defendant on May 6, 2024, regarding the filing of this application and Defendant consents to this application.

WHEREFORE, the undersigned respectfully requests that the Court enter an order relieving PLG, myself, and Maryam N. Hadden as counsel and allow Defendant at least forty-five (45) days from the date of such Order to retain new counsel.

Dated: May 6, 2024

Respectfully submitted,



Timothy C. Parlatore, Esq.
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